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Christianna Lewis Barnhart  
Attorney Advisor  
Telecommunications Access Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Christi,

I just wanted to follow-up to express the WNY RBHN's appreciation for your willingness to listen to our comments/observations on perceived merits and limitations of the Rural Broadband Pilot initiative on February 24<sup>th</sup>.

We here at R-AHEC view the Pilot as having been a very positive opportunity, one that is actually continuing to increase in value for the regional health provider community. Were the Pilot to be continued and additional resources made available, there is little doubt that our Network would have the potential to more than double in size over a very short period of time.

There is one very clear limiter, however, and that is the absolute lack of funding for local project administration and overhead. I have attached a 2011 fiscal summary of the WNY project experience for your consideration. As can be clearly seen, the project to date is an absolute cost drain on our agency as the local Pilot's sponsor. To make matters worse, we are an Area Health Education Center (AHEC) and not a direct provider of care. Therefore, as sponsor, we are not eligible to benefit from the very broadband subsidy we are making available to our healthcare partners! It is a very difficult situation to defend to my not-for-profit Board of Directors. Doing the right thing, simply because it is the right thing to do, only takes an organization so far. In fact, the more successful we become, the greater the administrative burden we must accommodate.

Thank you again for inviting our input.

Respectfully,

A handwritten signature in black ink that reads "Kenneth L. Oakley".

Kenneth L. Oakley, Ph.D. FACHE  
Chief Executive Officer